

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JOSHUA SCHMITT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CHINA XD PLASTICS COMPANY,
LIMITED, FAITH DAWN LIMITED, FAITH
HORIZON, INC., XD ENGINEERING
PLASTICS COMPANY LIMITED, JIE HAN,
TAYLOR ZHANG, LINYUAN ZHAI, HUIYI
CHEN and GUANBAO HUANG,

Defendant.

Civil Action No.: 1:20-cv-06028-NGG-SJB

**DECLARATION OF LEE SQUITIERI IN SUPPORT OF THE MOTION
PURSUANT TO PSLRA 15 U.S.C. §78u-4(a)(3)(B) FOR APPOINTMENT
OF LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Lee Squitieri, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am a partner at the law firm of Squitieri & Fearon, LLP. We are counsel for the Plaintiff. I submit this declaration in support of the motion for appointment as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), and approval of their selection of Squitieri & Fearon, LLP as Lead Counsel for the class.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of Filing of Action, March 2, 2021;

Exhibit B: Statement of Plaintiff’s Stockholdings and Estimated Losses;

Exhibit C: Firm Resume of Squitieri & Fearon, LLP; and

Exhibit D: Verification of the Plaintiff.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 30th day of April 2021.

/s/ Lee Squitieri

Lee Squitieri